

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

GLENN D. GORRELL
ROBIN J. GORRELL

Debtor(s)

DEERE & COMPANY D/B/A JOHN DEERE
FINANCIAL

Plaintiff(s)/Movant(s)

vs.

GLENN D. GORRELL
ROBIN J. GORRELL
WILLIAM G. SCHWAB, Chapter 12 Trustee

Defendant(s)/Respondent(s)

CHAPTER 12

CASE NO. 5 - 18 -bk- 05276-RNO
Jointly Administered with 5: 18-bk-05275

ADVERSARY NO. - - ap- -
(if applicable)

Nature of Proceeding: Motion for

Adequate Protection

Document #: 37

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Movant requests a Two (2) Week continuance of the Motion for Adequate Protection Hearing scheduled for Tuesday May 14, 2019 at 9:30 am to give the Movant and the Debtors time to work out a settlement of the Adequate Protection Payments.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: May 10, 2019

/s/ Keri P. Ebeck

Attorney for Deere & Company d/b/a John Deere F

Name: Keri P. Ebeck

Phone Number: (412) 456-8112

¹ No alterations or interlineations of this document are permitted.